

SIGAL CHATTAH
United States Attorney
District of Nevada
Nevada Bar Number 8264
JACOB H. OPERSKALSKI
Assistant United States Attorney
Nevada Bar Number 14746
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
PHONE: (702) 388-6336
jacob.operskalski@usdoj.gov
Representing the United States of America

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
APR 09 2025	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PAUL HYON KIM,

Defendant.

CRIMINAL INDICTMENT

Case No.: 2:25-cr-0093-JAD-EJY

VIOLATIONS:

18 U.S.C. § 844(i)
Arson of Property Used in Interstate
Commerce

18 U.S.C. § 844(i)
Attempted Arson of Property Used in
Interstate Commerce

26 U.S.C. § 5861(d)
Unlawful Possession of an Unregistered
Firearm (Destructive Device)

THE GRAND JURY CHARGES THAT:

COUNT ONE

Arson of Property Used in Interstate Commerce
(18 U.S.C. § 844(i))

On or about March 18, 2025, in the State and Federal District of Nevada,

PAUL HYON KIM,

defendant herein, maliciously damaged and destroyed by means of fire and an explosive, a gray Tesla, Model X, VIN 7SAXCBE62PF383520 located at 6260 West Badura Avenue, Las Vegas, NV 89118, a vehicle used in and affecting interstate commerce in violation of Title 18, United States Code, Section 844(i).

COUNT TWO

Arson of Property Used in Interstate Commerce
(18 U.S.C. § 844(i))

On or about March 18, 2025, in the State and Federal District of Nevada,

PAUL HYON KIM,

defendant herein, maliciously damaged and destroyed by means of fire and an explosive a white Tesla, Model 3, VIN 5YJ3E1EA7PF712426 located at 6260 West Badura Avenue, Las Vegas, NV 89118, a vehicle used in and affecting interstate commerce in violation of Title 18, United States Code, Section 844(i).

COUNT THREE

Attempted Arson of Property Used in Interstate Commerce
(18 U.S.C. § 844(i))

On or about March 18, 2025, in the State and Federal District of Nevada,

PAUL HYON KIM,

defendant herein, maliciously attempted to damage or destroy by means of fire and an explosive a black Tesla Model Y, VIN 7SAYGDEF4SF247757 located at 6260 West Badura Avenue, Las Vegas, NV 89118, a vehicle used in and affecting interstate commerce in violation of Title 18, United States Code, Section 844(i).

COUNT FOUR

**Possession of an Unregistered Firearm
(26 U.S.C. § 5861(d))**

On or about March 18, 2025, in the State and Federal District of Nevada,

PAUL HYON KIM,

defendant herein, knowingly possessed a firearm as defined in Title 26, United States Code, Section 5845(a)(8), to wit, a Molotov cocktail, not registered to him in the National Firearms Registration and Transfer Record, all in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

FORFEITURE ALLEGATION ONE

Arson of Property Used in Interstate Commerce, Attempted Arson of Property Used in Interstate Commerce, and Possession of an Unregistered Firearm

1. The allegations of Counts One, Two, Three, and Four of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture under 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts One, Two, Three, and Four of this Criminal Indictment,

PAUL HYON KIM,

defendant herein, shall forfeit to the United States of America, any firearm or ammunition involved in or used in any violation of any other criminal law of the United States, 18 U.S.C. § 844(i) and 26 U.S.C. § 5861(d):

- a. Palmetto State Armory (PSA), PA-15, Multi (caliber), bearing the serial number SCNL242328 with a .300 BLACKOUT upper receiver attached to the lower receiver;

- 1 b. Dead Air, Sandman K, 7.62mm, Silencer, bearing the serial number SMK-21705;
2 and
3 c. any and all compatible ammunition.

4 All under 18 U.S.C. § 844(i), 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c), and 26
5 U.S.C. § 5861(d).

6 **FORFEITURE ALLEGATION TWO**
7 Possession of an Unregistered Firearm

8 1. The allegations of Count Four of this Criminal Indictment are hereby realleged
9 and incorporated herein by reference for the purpose of alleging forfeiture under 26 U.S.C. §
10 5872(a) with 28 U.S.C. § 2461(c).

11 2. Upon conviction of the felony offense charged in Count Two of this Criminal
12 Indictment,

13 **PAUL HYON KIM,**

14 defendant herein, shall forfeit to the United States of America, any firearm involved in any
15 violation of 26 U.S.C. § 5861(d):

- 16 a. Palmetto State Armory (PSA), PA-15, Multi (caliber), bearing the serial number
17 SCNL242328 with a .300 BLACKOUT upper receiver attached to the lower
18 receiver;
19 b. Dead Air, Sandman K, 7.62mm, Silencer, bearing the serial number SMK-21705;
20 and
21 c. any and all compatible ammunition.

All under 26 U.S.C. § 5861(d) and 26 U.S.C. § 5872(a) with 28 U.S.C. § 2461(c).

DATED: this 9th day of April 2025.

A TRUE BILL:

/S/

FOREPERSON OF THE GRAND JURY

SIGAL CHATTAH
United States Attorney



JACOB H. OPERSKALSKI
Assistant United States Attorney